

Caridis, Alyssa

From: Kirk Anderson <kanderson@ghiplaw.com>
Sent: Friday, April 17, 2015 1:26 PM
To: Ramsey, Gabriel M.; Caridis, Alyssa
Cc: AudibleMagic-BlueSpike; <bluespike@ghiplaw.com>; H Dutton
Subject: Meet and confer - Dr. Quackenbush's expert report

Counsel:

Regarding the meet and confer that Blue Spike has requested for today between 4-6 pm Central or Tuesday 11-1 pm Central on the topic of IBM-related documents Audible Magic failed to produce, please also be prepared to discuss the inappropriate length of Dr. Quackenbush's expert report. Expert reports are intended, among other things, to provide the substance of what an expert will testify to at trial, not bury that testimony in 3600 pages. Dr. Quackenbush's lengthy report does not facilitate the exchange of information as discovery should, especially in this district where streamlined discovery is a paramount concern. Blue Spike insists that Audible Magic reduce the size of Dr. Quackenbush's expert report. If Audible Magic is unwilling to address this issue by correcting the report, Blue Spike will be forced to bring the issue to the court's attention.

Again, please be ready to discuss this issue during the meet and confer.

Best,



Kirk Anderson / Attorney
[888.908.4400](tel:888.908.4400) x102 / kanderson@ghiplaw.com
218 N College Ave, Tyler, TX 75702
44 N San Pedro, San Rafael, CA 94903
<http://www.ghiplaw.com>

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